



December 15, 2020

Reference No. 11215702

Mr. Gary Baumgarten, EPA Project Coordinator  
United States Environmental Protection Agency, Superfund Division (6SF-RA)  
1201 Elm Street, Suite 500  
Dallas, Texas 75270

**Re: San Jacinto River Waste Pits Superfund Site  
Monthly Progress Report No. 31 – November 2020  
EPA Region 6, CERCLA Docket No. 06-02-18 for Remedial Design**

Dear Mr. Baumgarten:

On behalf of International Paper Company (IPC) and McGinnes Industrial Maintenance Corporation (MIMC; collectively referred to as the Respondents), GHD Services Inc. (GHD) submits the November 2020 Monthly Progress Report to the United States Environmental Protection Agency (EPA), in accordance with the *Administrative Settlement Agreement and Order on Consent* (AOC), for the San Jacinto River Waste Pits Superfund Site (CERCLA Docket No. 06-02-18) located in Harris County, Texas (Site). This Monthly Progress Report No. 31 summarizes remedial design (RD) activities performed during the month of November 2020.

Consistent with the requirements of the AOC, this progress report was prepared on behalf of the Respondents and is organized into the following subject areas:

- Actions taken during previous period.
- Summary of sampling or testing results.
- AOC deliverables Respondents submitted to the EPA.
- Activities scheduled for the next month.
- Percentage of RD completion and potential schedule concerns.
- Modifications to approved work plans or schedules.
- Community Involvement Plan activities.
- Technical Working Group (TWG) activities.

## **1. Actions Taken During Previous Period**

- GHD and IPC met via video conference on November 4, 2020 with representatives of Glendale Boatworks to discuss availability of water sources for the RA work on the Southern Impoundment.
- The Respondents received a letter from EPA regarding its approval of the Remedial Design Work Plan (Integral and Anchor QEA, December 2018) on November 6, 2020.



- GHD met via video conference on November 10, 2020 with Gary Baumgarten and the new EPA project coordinators, Lauren Poulos and Ashley Howard, to provide background information on the project.
- The GHD Treatability Lab began the 24-hour recirculation testing described in the *Additional Treatability Testing Notice* on November 10, 2020. The testing is currently on-going.
- A TWG meeting was held on November 12, 2020, via Microsoft Teams. Additional details of this meeting are provided in Section 8.
- The Respondents, GHD, and the EPA met via video conference on November 13, 2020 with representatives from the Texas Department of Transportation (TxDOT) to continue coordination discussions around the remedial action (RA) and the upcoming Interstate 10 (I-10) bridge replacement project.
- The Respondents met via conference call with TxDOT (Ashley McDonald and Jessica Gray) to discuss extension of access agreements. TxDOT indicated it did not have a problem with the extension requests.
- The Respondents received comments on the *Pre- Final 90% Remedial Design - Southern Impoundment* on November 18, 2020. These comments will be addressed as part of the *Final 100% Remedial Design - Southern Impoundment* submittal (Southern Impoundment 100% RD), due to the EPA on December 18, 2020.
- The Respondents received a letter from EPA, dated November 19, 2020, indicating that EPA concurred with the conclusions in GHD's October 20, 2020 Northern Impoundment Waste Characterization Evaluation letter to the EPA.
- GHD submitted a Southern Impoundment Waste Characterization Evaluation letter to the EPA on November 5, 2020. On November 19, 2020, the EPA issued a letter stating that it concurred with the conclusions in GHD's November 5, 2020 letter.
- GHD had communication with the Coastal Water Authority (CWA) to discuss timing for receipt of downstream modeling outputs. GHD is still expecting to receive this data by the end of 2020.

## **2. Summary of Sampling and Testing Results**

- Additional treatability study activities are on-going, along with the necessary laboratory analyses. The excavation and settling simulation tests have been completed and the recirculation/filtration tests are on-going and will be completed in the coming months. The EPA has been provided updates on the testing during its weekly calls with GHD and during the November TWG meeting on November 12, 2020. The results from all testing will be discussed during upcoming TWG meetings and included in the *Pre-Final 90% Remedial Design - Northern Impoundment* (Northern Impoundment 90% RD).



### **3. AOC Deliverables Respondents Submitted to the EPA**

- No AOC Deliverables were submitted during this period.

### **4. Activities Scheduled for the Next Month**

- The Respondents will continue the additional treatability testing described in the *Additional Treatability Testing Notice*.
- The Respondents will continue to evaluate the treatability testing data.
- GHD will continue to meet via video conference with representatives of the relevant stakeholders (U.S. Army Corps of Engineers - Galveston District, Port of Houston Authority, U.S. Coast Guard, TxDOT and others) to obtain any necessary approvals and/or to coordinate on issues affecting their respective jurisdictions and authorities.
- GHD will remain in contact with the CWA to discuss the CWA's upcoming project to add gates to the Lake Houston control structure and the timing for receipt from CWA of downstream modeling inputs.
- GHD will remain in contact with TxDOT to obtain and track information regarding plans for the I-10 bridge replacement project and to address permitting considerations.
- The Respondents will continue efforts to obtain access required in connection with the Northern Impoundment remedy and the Southern Impoundment remedy.
- The Respondents will hold a TWG Meeting on December 15, 2020 to discuss the Northern Impoundment 90% RD.
- The Respondents will continue work on the 90% RD for the Northern Impoundment.
- The Respondents will finalize and submit the Southern Impoundment 100% RD on or before December 18, 2020.
- The Respondents will assist the EPA in preparations for the December 10, 2020 Community Advisory Group meeting.

### **5. Percentage of RD Completion and Potential Schedule Concerns**

- Overall, the RD is approximately 60 percent complete, based on the current RD schedule.

### **6. Modifications to Approved Work Plans or Schedules**

- No modifications to approved work plans or schedules occurred during this period.



## **7. Community Involvement Plan Activities**

- To the Respondents' knowledge, no community involvement activities occurred during this period.

## **8. Technical Working Group Activities**

- A TWG meeting was held on November 12, 2020, with attendees from the EPA, Texas Commission on Environmental Quality, United States Army Corps of Engineers, IPC, MIMC, Boh Brothers, and GHD to discuss the current status of the Northern Impoundment 90% RD and to provide an update on the treatability testing to date.
- Upcoming TWG Meetings are scheduled for December 15, 2020, and tentatively for February 4, 2021.

Should you have any questions or require additional information regarding this submittal, please contact GHD at (225) 292-9007.

Sincerely,

GHD

A handwritten signature in black ink, appearing to read "C. Munce", written in a cursive style.

Charles W. Munce, P.E.

SGC/kdn/6

cc: Katie Delbecq, TCEQ  
Phil Slowiak, IPC  
Brent Sasser, IPC  
Judy Armour, MIMC  
Ashley Howard, EPA  
Lauren Poulos, EPA